

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Robert M. Cole

Debtor(s)

CHAPTER 13

United Asset Management, LLC

Secured Creditor

vs.

NO. 20-11713 PMM

Robert M. Cole

Debtor(s)

Scott F. Waterman

Trustee

11 U.S.C. Section 362

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. United Asset Management, LLC (hereinafter referred to as "Secured Creditor"), through its predecessor, filed a secured Proof of Claim, Number 13, on May 28, 2020 with a total claim of \$9,747.20.
2. Secured Creditor's Proof of Claim is secured by the Property located at 3021 Penn Allen Road, Nazareth, PA 18064.
3. Secured Creditor and Debtor (hereinafter referred to as "the Parties") hereby agree upon the following:
 - a. Secured Creditor shall offer Debtor a loan modification, a copy of which is attached hereto as Exhibit A.
 - b. In exchange for the loan modification, Debtor agrees that the automatic stay as to Secured Creditor, and its successors and assigns, shall be vacated.
 - c. Court approval of this Stipulation shall constitute court approval of the attached loan modification.

- d. Upon Court approval of this Stipulation, the automatic stay shall be lifted as to Secured Creditor, and its successors and assigns.
 - e. Final completion of the loan modification is dependent upon court approval of this stipulation.
 - f. The stay provided by Bankruptcy Rule 4001(a)(3) is waived.
 - g. Secured Creditor's loan shall be excepted from and not included in any discharge entered in this underlying bankruptcy.
 - h. Upon Court approval of this Stipulation and corresponding Loan Modification Agreement, the Chapter 13 Trustee shall stop all disbursements on Secured Creditor's Proof of Claim.
4. The parties agree that a facsimile signature shall be considered an original signature.

Date: September 23, 2021

/s/Rebecca A. Solarz, Esq.
Rebecca A. Solarz, Esq.
Attorney for Secured Creditor

Date: 9/26/2021

[Signature]
David S. Gellert Esq.
Attorney for Debtor(s)

Date: 9/28/2021

[Signature]
Scott F. Waterman, Esq.
Chapter 13 Trustee

Approved by the Court this 30th day of September, 2021. However, the court retains discretion regarding entry of any further order.

Patricia M. Mayer

Bankruptcy Judge
Patricia M. Mayer Judge